## WILMERHALE

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February 1, 2007

## BY ELECTRONIC FILING

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: EB Docket 06-36 -- Certification of Compliance with 47 C.F.R. § 64.2001 et seq.

Dear Ms. Dortch:

Baltimore

Pursuant to section 64.2009(e) of the Commission's rules, 47 C.F.R. § 64.2009(e), attached for filing is the Certification of Compliance of GUSA Licensee, LLC with the Commission's rules governing the use of Customer Proprietary Network Information ("CPNI"). Should there be any questions concerning this matter, please contact the undersigned.

Sincerely yours,

Josh L. Roland

Counsel to GUSA Licensee, LLC

cc: Byron McCoy (via email)
Best Copy and Printing (via email)

## CERTIFICATION OF CPNI FILING OF GUSA LICENSEE LLC

## February 1, 2007

On behalf of GUSA Licensee LLC ("Globalstar"), I hereby certify that I have personal knowledge that Globalstar complies with the Commission's rules governing the use of Customer Proprietary Network Information, 47 C.F.R. §§ 64.2001 et seq.

To the extent that it is not exempt from the Commission's rules by virtue of being a Mobile Satellite Services provider under 47 C.F.R. Part 25, Globalstar is classified as a CMRS carrier for most purposes. Globalstar does not use, disclose, or permit access to individually identifiable customer proprietary network information except as permitted under the Commission's rules. Globalstar posts its basic policies and procedures with respect to subscriber CPNI on its Internet site. Globalstar does not have any affiliates that market or sell communications-related services or equipment in the United States; therefore, the provisions of 47 C.F.R. §§ 64.2001 et seq., that address sharing of CPNI among affiliates are inapplicable. Globalstar refrains from outbound marketing of service offerings to its subscribers; rather, Globalstar only responds to inbound inquiries from subscribers who contact Globalstar's customer care center or who respond to bill inserts and Internet postings. In the course of responding to inbound inquiries, Globalstar complies with all of the relevant provisions of 47 C.F.R. §§ 64.2001 et seq.

William F. Adler

Member, Board of Managers, and

Assistant Secretary